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Counsel to the Debtors and
Debtors in Possession

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

- - - - - x
In re: : Chapter 11
:
CIRCUIT CITY STORES, INC., : Case No. 08-35653 (KRH)
et al., :
:
Debtors. : Jointly Administered
- - - - - x

**DEBTORS' MOTION FOR ORDER SHORTENING NOTICE PERIOD
AND LIMITING NOTICE OF (I) DEBTORS' MOTION, PURSUANT TO
BANKRUPTCY CODE SECTION 105 AND BANKRUPTCY RULE 9019, FOR
ORDER APPROVING SETTLEMENT AGREEMENT AND STIPULATION BY AND
AMONG THE DEBTORS AND THE POST-PETITION DIRECTORS AND
OFFICERS OF INTERTAN, INC. AND VENTOUX INTERNATIONAL, INC.;
AND (II) CONSENT MOTION OF THE DEBTORS FOR ENTRY OF ORDER
RESOLVING THE UNITED STATES CUSTOMS AND BORDER
PROTECTION'S OBJECTION TO CONFIRMATION**

The debtors and debtors in possession in the
above-captioned jointly administered cases (collectively,

the "Debtors")¹ hereby move this Court (the "Motion to Shorten and Limit Notice") for an order under section 102 of title 11 of the United States Code (the "Bankruptcy Code") and Rules 2002, 9006 and 9007 of the Federal Rules of Bankruptcy Procedures (the "Bankruptcy Rules") approving shortened and limited notice for (i) the Debtors' Motion, Pursuant to Bankruptcy Code Section 105 and Bankruptcy Rule 9019, for Order Approving Settlement Agreement and Stipulation by and among the Debtors and the Post-Petition Directors and Officers of Intertan, Inc. and Ventoux International, Inc. (the "9019 Motion"); and (ii) Consent Motion of the Debtors for Entry of Order Resolving the United States Customs and Border Patrol's Objection to Confirmation (the "Consent Motion" and collectively with the foregoing, the "Motions"). In support of the Motion to Shorten and Limit Notice, the Debtors respectfully represent as follows:

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are as follows: Circuit City Stores, Inc. (3875), Circuit City Stores West Coast, Inc. (0785), InterTAN, Inc. (0875), Ventoux International, Inc. (1838), Circuit City Purchasing Company, LLC (5170), CC Aviation, LLC (0841), CC Distribution Company of Virginia, Inc. (2821), Circuit City Properties, LLC (3353), Kinzer Technology, LLC (2157), Abbott Advertising Agency, Inc. (4659), Patapsco Designs, Inc. (6796), Sky Venture Corp. (0311), PRAHS, INC. (n/a), XSStuff, LLC (9263), Mayland MN, LLC (6116), Courchevel, LLC (n/a), Orbyx Electronics, LLC (3360), and Circuit City Stores PR, LLC (5512). The address for the Debtors is 4951 Lake Brook Drive, Suite #500, Glen Allen, VA 23060.

JURISDICTION AND VENUE

1. This Court has jurisdiction to consider this Motion to Shorten and Limit Notice under 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. § 157(b). Venue of these cases and this Motion to Shorten and Limit Notice in this District is proper under 28 U.S.C. §§ 1408 and 1409.

2. The statutory predicates for the relief requested herein are Bankruptcy Code section 102 and Bankruptcy Rules 2002, 9006 and 9007.

BACKGROUND

3. On November 10, 2008 (the "Petition Date"), the Debtors filed voluntary petitions in this Court for relief under chapter 11 of the Bankruptcy Code.

4. On November 12, 2008, the Office of the United States Trustee for the Eastern District of Virginia appointed a statutory committee of unsecured creditors (the "Creditors' Committee"). To date, no trustee or examiner has been appointed in these chapter 11 cases.

5. On January 16, 2009, the Court authorized the Debtors, among other things, to conduct going out of business sales at the Debtors' remaining 567 stores pursuant to an agency agreement (the "Agency Agreement") between the

Debtors and a joint venture, as agent (the "Agent"). On January 17, 2009, the Agent commenced going out of business sales pursuant to the Agency Agreement at the Debtors' remaining stores. The going out of business sales concluded on or about March 8, 2009.

6. On September 29, 2009, the Debtors and the Creditors' Committee (collectively, the "Plan Proponents") filed the First Amended Joint Plan of Liquidation of Circuit City Stores, Inc. and its Affiliated Debtors and Debtors In Possession and its Official Committee of Creditors Holding General Unsecured Claims (the "First Amended Plan"). The associated disclosure statement (the "Disclosure Statement") was approved on September 24, 2009. Confirmation of the First Amended Plan was originally scheduled for November 23, 2009, but has been adjourned from time to time.

7. On June 2, 2010, the Debtors filed the Debtors' Motion for Order Directing Mediation with Respect to First Amended Joint Plan of Liquidation of Circuit City Stores, Inc. and Its Affiliated Debtors and Debtors in Possession and Its Official Committee of Creditors Holding General Unsecured Claims (the "Mediation Motion") (Docket No. 7687), pursuant to which the Debtors requested that the Bankruptcy Court order the Debtors and the Creditors'

Committee to mediate their differences with respect to the First Amended Plan.

8. The Creditors' Committee supported the Mediation Motion and, following a hearing on June 24, 2010, the Bankruptcy Court entered an order granting the Mediation Motion (Docket No. 7912, the "Mediation Order").

9. Pursuant to the Mediation Order, mediation commenced on July 14, 2010 before the Honorable Frank J. Santoro. Following extensive negotiations during the mediation, the Plan Proponents reached an agreement on the outstanding issues (the "Mediation Agreement").

10. On August 9, 2010, the Debtors and the Creditors' Committee filed the Supplemental Disclosure with Respect to Second Amended Joint Plan of Circuit City Stores, Inc. and its Affiliated Debtors and Debtors in Possession and its Official Committee of Creditors Holding General Unsecured Claims and Notice of Deadline to Object to Confirmation (the "Supplement") and the Second Amended Joint Plan of Liquidation of Circuit City Stores, Inc. and its Affiliated Debtors and Debtors In Possession and its Official Committee of Creditors Holding General Unsecured Claims (the "Plan").

11. Generally, the Plan provides for the liquidation of the Debtors under chapter 11 of the Bankruptcy Code.

RELIEF REQUESTED

12. By this Motion to Shorten and Limit Notice, the Debtors request entry of an order shortening the notice period and limiting notice of the Motions so they can be heard, considered and ruled upon by the Court at a previously scheduled hearing on September 8, 2010, concurrent with the hearing on confirmation of the Plan.

BASIS FOR RELIEF

13. Pursuant to the Mediation Agreement, the Plan Proponents agreed to the terms of the settlement agreement that is the subject of the 9019 Motion, and agreed to seek its approval in connection with confirmation of the Plan. Moreover, the terms of the settlement agreement were disclosed on August 9, 2010 as part of the Supplement. Finally, since the hearing on confirmation of the Plan is scheduled for September 8, 2010, the Debtors, with the support of the Creditors' Committee, request that the 9019 Motion be heard at that time.

14. Additionally, because the Consent Motion seeks entry of an order resolving the United States Customs

and Border Patrol's objection to confirmation of the Plan, the parties submit that it should be heard concurrent with the hearing on confirmation of the Plan, which is scheduled for September 8, 2010 at 10:00 a.m. The Creditors' Committee has no objection to this request.

15. The Debtors believe it is in the best interest of the Debtors' estates, their creditors, and other parties in interest for the Motions to be heard at the hearing on September 8, 2010 at 10:00 a.m. (Eastern) because confirmation of the Plan is set for that date and the Debtors believe it will serve the best interests of the Debtors' estates, their creditors, and other parties in interest to have the Motions heard at the same time as the hearing on confirmation of the Plan.

16. Notice of this Motion to Shorten and Limit Notice is being provided to parties-in-interest in accordance with the Court's Supplemental Order Pursuant to Bankruptcy Code Sections 102 and 105, Bankruptcy Rules 2002 and 9007, and Local Bankruptcy Rules 2002-1 and 9013-1 Establishing Certain Notice, Case Management and Administrative Procedures (Docket No. 6208) (the "Case Management Order"). In light of the nature of the relief

requested, the Debtors respectfully submit that no further notice is necessary.

WAIVER OF MEMORANDUM OF LAW

17. Pursuant to Local Bankruptcy Rule 9013-1(G), and because there are no novel issues of law presented in the Motion to Shorten and Limit Notice and all applicable authority is set forth in the Motion to Shorten and Limit Notice, the Debtors request that the requirement that all motions be accompanied by a separate memorandum of law be waived.

NO PRIOR REQUEST

18. No previous request for the relief sought herein has been made to this Court or any other court.

CONCLUSION

WHEREFORE, the Debtors respectfully request that the Court (i) enter an Order, substantially in the form of Exhibit A attached hereto, granting the relief requested herein, and (ii) grant the Debtors such other and further relief as may be just and proper.

Dated: September 3, 2010
Richmond, Virginia

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Counsel for Debtors and Debtors
in Possession

Exhibit A

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 In re: : Chapter 11
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 CIRCUIT CITY STORES, INC., : Case No. 08-35653 (KRH)
 et al., :
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 Debtors. : Jointly Administered
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ORDER GRANTING DEBTORS' MOTION FOR ORDER SHORTENING NOTICE
 PERIOD AND LIMITING NOTICE OF (I) DEBTORS' MOTION, PURSUANT
 TO BANKRUPTCY CODE SECTION 105 AND BANKRUPTCY RULE 9019, FOR
 ORDER APPROVING SETTLEMENT AGREEMENT AND STIPULATION BY AND
 AMONG THE DEBTORS AND THE POST-PETITION DIRECTORS AND
 OFFICERS OF INTERTAN, INC. AND VENTOUX INTERNATIONAL, INC.;
 AND (II) CONSENT MOTION OF THE DEBTORS FOR ENTRY OF ORDER
 RESOLVING THE UNITED STATES CUSTOMS AND BORDER
 PROTECTION'S OBJECTION TO CONFIRMATION

Upon consideration of the Debtors' Motion for Order Shortening Notice Period and Limiting Notice (the "Motion to Shorten and Limit Notice") of (i) the Debtors' Motion, Pursuant to Bankruptcy Code Section 105 and Bankruptcy Rule 9019, for Order Approving Settlement Agreement and Stipulation by and among the Debtors and the Post-Petition Directors and Officers of Intertan, Inc. and Ventoux International, Inc. (the "9019 Motion"); and (ii) Consent Motion of the Debtors for Entry of Order Resolving the United States Customs and Border Patrol's Objection to Confirmation (the "Consent Motion" and collectively with the foregoing, the "Motions"); and the Court having reviewed the Motion to Shorten and Limit Notice; and the Court having determined that the relief requested in the Motion to Shorten and Limit Notice is in the best interests of the Debtors, their estates, their creditors, and other parties in interest; and it appearing that proper and adequate notice of the Motion to Shorten and Limit Notice has been given and that no other or further notice is necessary; and upon the record herein; and after due deliberation thereon; and good and sufficient cause appearing therefor, it is hereby

ORDERED, ADJUDGED, AND DECREED that:

1. The Motion to Shorten and Limit Notice is GRANTED.
2. Notice of the Motions is shortened so that they may be heard, considered and ruled upon by the Court at a hearing on September 8, 2010 at 10:00 a.m. (Eastern).
3. Notice of the Motions is limited to the parties as set forth in the Motion to Shorten and Limit Notice.
4. This Court will retain jurisdiction with respect to any dispute concerning the relief granted hereunder.

Dated: Richmond, Virginia
September ___, 2010

UNITED STATES BANKRUPTCY JUDGE

WE ASK FOR THIS:

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Counsel to the Debtors and Debtors in Possession

CERTIFICATION OF ENDORSEMENT UNDER LOCAL RULE 9022-1(C)

Pursuant to Local Bankruptcy Rule 9022-1(C), I hereby certify that the foregoing proposed order has been endorsed by or served upon all necessary parties.

/s/ Douglas M. Foley